



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

FEB 29 2016

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-101

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION

The Honorable James R. Smith
Mayor of Soda Springs
City of Soda Springs
9 W. 2nd Street
Soda Springs, Idaho 83276

Re: City of Soda Springs WWTP
NPDES Permit Number ID-002081-8

Dear Mayor Smith:

On November 16, 2001, the U.S. Environmental Protection Agency (EPA) issued a National Pollutant Discharge Elimination System (NPDES) permit to the City of Soda Springs, Idaho ("City") wastewater treatment facility ("Facility"), NPDES Permit Number ID-002081-8 ("Permit"). The Permit was administratively extended on May 4, 2007. The purpose of this letter is to notify the City of violations EPA discovered after reviewing administrative files including the Discharge Monitoring Reports (DMRs) submitted by the City, and in response to the November 19, 2015 inspection of the Facility conducted by the Idaho Department of Environmental Quality (IDEQ) on behalf of EPA. The purpose of this inspection was to determine the Facility's compliance with the requirements of the Clean Water Act (CWA) and the NPDES permit. I would like to express my appreciation for your staff's time and cooperation during the inspection.

REVIEW OF ADMINISTRATIVE FILES

1. EPA reviewed the DMRs from February 2011 to February 2016 and identified effluent limitation exceedances that constitute 639 violations of the CWA, 33 U.S.C. § 1251 *et seq.* A list of the violations is enclosed (Enclosure A).
2. Part 5.2 of the Permit specifies that the permittee must summarize monitoring results each month on the Discharge Monitoring Report (DMR) form (EPA No. 3320-1) or equivalent or forms provided or specified by the Director for reporting results of monitoring of sludge use or disposal practices. The permittee must submit reports monthly, postmarked by the 10th day of the following month. The permittee must sign and certify all DMRs, and all other reports, in accordance with the requirements of Part 7.5 of this permit ("Signatory Requirements").

During EPA review of DMR data from February 2011 to February 2016, it was identified that the City submitted two incomplete DMRs. The April 2015 DMR did not include an entry for the daily maximum of the "Nitrogen, ammonia total [as N]" parameter and the November 2015 DMR did not

include an entry for the daily maximum of the "Solids, total suspended" parameter. These are violations of Part 5.2 of the Permit.

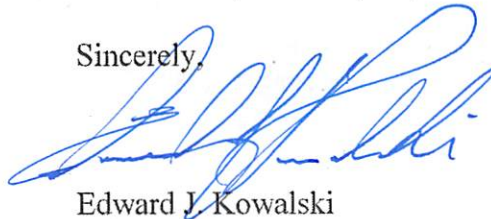
On December 21, 2015, the NPDES Electronic Reporting Rule became effective. Permittees with a DMR requirement will have one year from this date to submit DMRs through NetDMR. Additional information is enclosed (Enclosure B).

At the time of the inspection, the inspector did not note any areas of concern or deficiencies.

Although our goal is to ensure NPDES facilities comply fully with their permits, the ultimate responsibility rests with the permittee. As such, I want to strongly encourage you to continue your efforts to maintain full knowledge of the Permit requirements, and other appropriate statutes, and to take appropriate measures to ensure compliance. Notwithstanding your response to this letter, EPA retains all rights to pursue enforcement actions to address these and any other violations.

I have enclosed a copy of the inspection report (Enclosure C). If you have any questions concerning this matter, please do not hesitate to contact Raymond Andrews of my staff at (206) 553-4252.

Sincerely,



Edward J. Kowalski
Director

Enclosures

cc: Mr. Stephen Berry
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